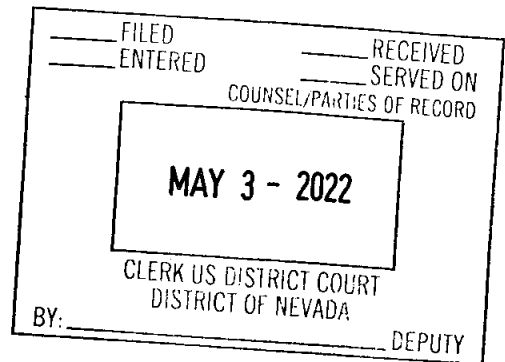




SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar Number 14853
ERIC SCHMALE
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: 702.388.6265/ Fax: 702.388.6418
eric.schmale@usdoj.gov



CHRISTOPHER LIN
Trial Attorney
United States Department of Justice, Tax Division
Western Criminal Enforcement Section
4 Constitutional Square
150 M Street, N.E.
Washington, D.C. 20002
christopher.e.lin@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO IVAN VELAZQUEZ,
aka "Francisco Velazquez Ramos," and
aka "Ivan Velazquez,"

Defendant.

**SEALED
CRIMINAL INDICTMENT**

Case No. 2:22-cr- 0090 JAD NJK

VIOLATIONS:

Wire Fraud (18 U.S.C. § 1343)

Impersonation of Officer or Employee of
the United States (18 U.S.C. § 912)

THE GRAND JURY CHARGES THAT:

Introductory Allegations

At all times relevant to this Indictment, unless otherwise noted:

1. The Internal Revenue Service (IRS) was and is an agency of the United
States, within the Department of Treasury.

1 2. The defendant FRANCISCO IVAN VELAZQUEZ, also known as
2 “Francisco Velazquez Ramos” and “Ivan Velazquez,” was a citizen of Mexico present in
3 the United States. VELAZQUEZ was not an officer or employee of the United States, the
4 Department of Treasury, or the IRS.

5 3. “U.S. A DBA IRS Inc.” was a business registered on or about May 5, 2016,
6 in the District of Columbia, listing VELAZQUEZ as the beneficial owner and registered
7 agent, with a beneficial owner’s address of 1717 K-Street NW, Suite 900, Washington D.C.
8 20006.

9 4. “Federal Holding FHPF Limited Liability Company” was a business
10 registered on or about August 2, 2017, in the State of New Jersey, listing VELAZQUEZ as
11 the registered agent.

12 **The Scheme to Defraud**

13 5. Beginning no later than in or about March 2016, and continuing up to and
14 including in or about March 2018, in the State and Federal District of Nevada and
15 elsewhere, VELAZQUEZ participated in and devised and intended to devise a scheme and
16 artifice to defraud, and for obtaining money and property from individuals by means of
17 materially false and fraudulent pretenses, representations, and promises, as further set forth
18 below.

19 **Purpose of the Scheme to Defraud**

20 6. The purpose of the scheme and artifice to defraud was for VELAZQUEZ to
21 fraudulently obtain money from individual victims whom VELAZQUEZ falsely told were
22 eligible to apply for funds from the IRS. Specifically, VELAZQUEZ appeared at meetings
23 of potential victims, including meetings attended by Victim G.B. and Victim C.T.
24 referenced below, and falsely held himself out to be an employee of the IRS, and falsely

1 claimed that he was able to obtain hundreds of thousands of dollars from the IRS for the
 2 potential victims. VELAZQUEZ falsely claimed that such funds were available from a
 3 purported IRS program which allowed people who had previously lost a home to
 4 foreclosure to recoup money by applying to the IRS and filing certain documents.
 5 VELAZQUEZ advised victims that he could submit an application for them to recover the
 6 funds, but that they would have to pay thousands of dollars for VELAZQUEZ to do so.

7 **COUNTS ONE AND TWO**

8 *Wire Fraud*
 (18 U.S.C. § 1343)

9 7. The paragraphs set forth in paragraphs 1 through 6 above are re-alleged and
 10 incorporated as if fully set forth herein.

11 8. On or about the dates below, in the State and Federal District of Nevada and
 12 elsewhere,

13 **FRANCISCO IVAN VELAZQUEZ,**
 14 **aka "Francisco Velazquez Ramos," and**
aka "Ivan Velazquez,"

15 defendant herein, for the purpose of executing the above scheme and artifice to defraud,
 16 caused to be transmitted by means of wire communication in interstate commerce, that is,
 17 originating within the State and Federal District of Nevada and traveling across state lines
 18 to another state, the following writings, signs, signals, pictures, and sounds, with each wire
 19 communication constituting a separate violation of Title 18, United States Code, Section
 20 1343:

Count	Date	Description of Wire Communication
ONE	5/9/2017	Interstate wire between a JP Morgan Chase Bank branch located in Las Vegas, Nevada, and a processing center located outside of Nevada, for purpose of generating Victim G.B.'s cashier's check number ending -0201, payable to "Deputy Bureau Audit IRS" in the amount of \$2,000

Count	Date	Description of Wire Communication
TWO	5/9/2017	Interstate wire between a JP Morgan Chase Bank branch located in Las Vegas, Nevada, and a processing center located outside of Nevada, for purpose of generating Victim G.B.'s cashier's check number ending -0202, payable to "Federal Holding & Private Funding" in the amount of \$2,500

COUNT THREE

Impersonation of an Officer or Employee of the United States
(18 U.S.C. § 912)

9. The allegations in paragraphs 1 through 6 are re-alleged and incorporated as if fully set forth herein.

10. Between in or about April 2017 and continuing up to and including on or about August 7, 2017, in the State and Federal District of Nevada,

**FRANCISCO IVAN VELAZQUEZ,
aka "Francisco Velazquez Ramos," and
aka "Ivan Velazquez,"**

defendant herein, falsely assumed and pretended to be an officer and employee of the United States, and a department and agency thereof, namely, the IRS, and acting under the authority thereof, and in such pretended character, demanded and obtained, money and things of value from Victim G.B., in the form of two cashier's checks and a money order totaling \$4,799, all in violation of Title 18, United States Code, Section 912.

COUNT FOUR

Impersonation of Officer or Employee of the United States
(18 U.S.C. § 912)

11. The allegations in paragraphs 1 through 6 are re-alleged and incorporated as if fully set forth herein.

12. Between in or about March 2017 and continuing up to and including on or about June 8, 2017, in the State and Federal District of Nevada,

DATED this 3rd day of May, 2022.

/S/
FOREPERSON OF THE GRAND JURY

ERIC C. SCHMALE
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA